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UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER JOSHUA RUGGLES,

Defendant.

Case No. 3:20-cr-00505-1-IM

DECLARATION OF SAMUEL C. KAUFFMAN (Re: Unopposed Motion to Continue Trial)

- I, Samuel C. Kauffman, declare that the following statements are true to the best of my knowledge, information and belief:
 - 1. I am counsel for the defendant Christopher Ruggles.
- 2. I make this declaration in support of our motion for an order continuing the trial, currently scheduled for April 6, 2021, for at least 90-days.

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3. The Court appointed me to represent Mr. Ruggles on November 16,2020. This is my second request for continuance on behalf of Mr. Ruggles.

4. Mr. Ruggles is charged with four other people in a methamphetamine conspiracy. He is currently in custody, but the Court has approved his release pending an opening at a residential treatment facility.

5. We need a continuance of the current trial date for approximately 90 days in order to have adequate time to complete discovery review; to conduct pretrial investigation; to prepare for trial; and to otherwise complete preparations for Mr. Ruggles' defense.

8. Assistant United States Attorney Paul Maloney does not oppose the requested continuance.

9. Mr. Ruggles, who is in currently in custody told me that he consents to the requested continuance of his trial.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 26th day of March 2021.

/s/ Samuel C. Kauffman
SAMUEL C. KAUFFMAN